

JUDGE'S COPY

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IN THE UNITED STATES DISTRICT COURT, FOR THE MIDDLE DISTRICT
OF PENNSYLVANIA---

FILED
HARRISBURG, PA

JEFFERY, PAUL MOSER

MAY 11 2001

CIVIL NO# 1100 - CV - 1846

VS.

- Jury Trial Demanded -

KENNETH KYLER, ET AL.

MARY E. D'ANDREA, CLERK
Deputy Clerk

Judge: William W. Caldwell

Motion For RE-consideration of Plaintiff

" Motion For Appointment of Counsel "

WHEREFORE I, JEFFERY, PAUL MOSER (Plaintiff) ASK THE HONORABLE COURT TO RE-CONSIDER MOSER REQUEST FOR COUNSEL AND APPOINT COUNSEL AT THIS TIME.

A.) THE HONORABLE COURT STATED THAT MOSER DID NOT CONTACT ATTORNEYS ON HIS OWN. THIS IS NOT TRUE, PLEASE SEE THE ATTACHED EXHIBITS, IT IS CLEAR MOSER HAS AND CONTINUES TO ATTEMPT TO GET REPRESENTATION ON HIS OWN, BUT HAS NOT PREVAILED, AND NOW BEGS THE HONORABLE COURT FOR COUNSEL. MOSER HAS MORE DOCUMENTATION OF THIS, BUT IS UNABLE TO AFFORD COPIES AND POSTAGE TO MAKE SERVICE ON THE COURT, AND THE PRISON REFUSES TO ASSIST IN ANY MANNER. ALL MOSER COULD AFFORD IS EXPOSED.

B.) MOSER IS DISABLED, AND RECENTLY HAD A NEW (M.R.E.) DONE AT HUNNINGDON, WHICH STATES HIS CONDITION HAS EXTREMELY WORSE, SINCE THE LAST ONES ENTER WITH THE COMPLAINT. THUS MOSER NEEDS ASSISTANCE OF COUNSEL TO (AMEND COMPLAINT, DISCOVERY MOTIONS) AS HE IS MEDICALLY INCAPABLE OF LITIGATING IT HIMSELF.

C.) MOSER IS IN FACT, BEING RETALIATED AGAINST BY STAFF AS A RESULT OF THIS ACTION. (C.O.I. MILLER, C.O.I. HECK, ETC.) AND ALSO CAN NOT GET FULL SERVICE THRU THE MARSHALL SERVICE AND BELIEVES FURTHER RELIEF IS NEEDED. PLEASE GRANT COUNSEL AT THIS TIME.

SUBORN SERVICES

Respectfully: Jeffery Paul Moser 5/9/2001
(Plaintiff)

(Proof of Service) I HEREBY SWEAR UNDER THE PENALTY OF PERJURY THAT I, J.P. MOSER, MADE SERVICE UPON THE COURT AND DEFENDANTS AS COPIES PROVIDED OF THIS DOCUMENT. All Moser 5/9/01 court copy

**LAW OFFICES OF
ERIC A. SHORE, P.C.**

1015 Chestnut Street, Suite 702
Philadelphia, Pennsylvania 19107-4307
Fax (215) 923-5951
(215) 627-9999

ERIC A. SHORE
JOSEPHINE FOO

June 29, 2000

Mr. Jeffrey Paul Moser BE4713
1111 Altamont Blvd.
Frackville, PA 17931

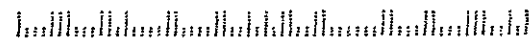
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PHILADELPHIA, PA 19107



Mr. Jeffrey Paul Moser BE4713
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22

17931X2601 03



EAS/gs

(Exhibit (A))

JOSEPH HOLOCHUCK
ATTORNEY AT LAW
132 SOUTH THIRD STREET
MINERSVILLE, PA. 17954



Jeffrey Paul Moser
Inmate BE 4713
1111 Altamont Boulevard
Frackville, PA 17931

22 AA

17531/2693

In reference to your letter of June 27, 2000, I thank you for considering me to be your attorney. However, at this particular time, I no longer do the type of work involving your case and consequently, I would be of no service to you.

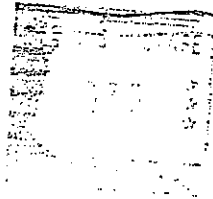
JH:jah

Very truly yours,

Joseph Holochuck
Joseph Holochuck

Exh. B-4 (B)

AW OFFICES
JOSEPH L. ROMANO
COMMONWEALTH BANK PLAZA
2 WEST LAFAYETTE STREET
NORRISTOWN, PA 19401-4725



[Handwritten scribbles]

MR JEFFREY PAUL MOSER
BE4713
1111 ALTAMONT BLVD
FRACKVILLE PA 17931

17931+2601 *[Barcode]*

Dear Mr. Moser:

I reviewed your letter to me dated June 1, 2000. I choose not to represent you in this matter. I can not tell by your letter what the statute of limitations is (the time period for which you have to file a claim) but, I urge you to contact an attorney immediately.

Very truly yours,

[Signature]
Joseph L. Romano

JLR:tag

EXHIBIT (C)

WILLIAM R. CAROSELLI
 EDWIN H. BEACHLER
 JOHN W. McTIERNAN
 TIMOTHY CONBOY
 THOMAS G. SMITH
 CRAIG E. COLEMAN*
 DAVID A. MCGOWAN**
 CATHERINE A. BAXTER

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McTIERNAN
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CAROSELLI BEACHLER McTIERNAN & CONBOY LLC
 312 BOULEVARD OF THE ALLIES • EIGHTH FLOOR
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DANIEL K. BRICMONT
 JOHN J. GAUGHAN
 WILLIAM A. PENROD
 KEVIN W. LEE
 SUSAN A. MEREDITH
 JOANNA P. PAPAZEKOS
 KELLY L. ENDERS
 MICHAEL B. DODD
 LOTTA CRABTREE

* ADMITTED IN PA & NJ
 ** ADMITTED IN PA & OH

June 22, 2000

File No. CBMC-inq

Jeffery Paul Moser
 1111 Altamont Boulevard
 Frackville, PA 17931

In Re: Medical Negligence Inquiry

Dear Mr. Moser:

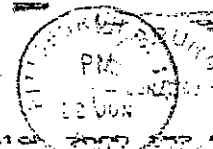
Thank you for your note of June 16, 2000. Unfortunately, we cannot be of any assistance in this matter. I would suggest that you consult another attorney who practices in your jurisdiction.

Very truly yours,

John W. McTiernan
 John W. McTiernan

CAROSELLI
BEACHLER
McTIERNAN
CONBOY

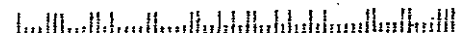
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 15222-1916



Jeffery Paul Moser
 1111 Altamont Boulevard
 Frackville, PA 17931

Handwritten notes:
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Exh: B4(D)